

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS

FILED

SEP 16 2014

CLERK, U.S. DISTRICT COURT

By

Deputy

UNITED STATES OF AMERICA

v.

No. 4:14-MJ - 393

CARLOS JORGE HINOJOSA (01)

CRIMINAL COMPLAINT

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or before about March 25, 2014, in the Northern District of Texas and elsewhere, the defendant, **Carlos Jorge Hinojosa**, did attempt to file in a public record with the Business and Commercial Services Division of the Arkansas Secretary of State, a false lien and encumbrance against the real and personal property of an officer and employee of the United States Government described in 18 U.S.C. § 1114, to wit, a United States District Judge, on account of the performance of official duties by that individual, knowing and having reason to know that such lien and encumbrance was false and contained materially false, fictitious, and fraudulent statements and representations. In violation of 18 U.S.C. § 1521.

I, Marcus Watson, further state that I am a Special Agent with the FBI assigned to the Dallas Division, and that this Complaint is based upon the following facts:

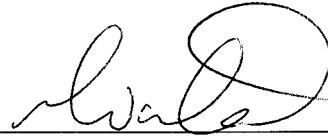
1. I have been employed as a Special Agent with the FBI for approximately four years. The information contained in this complaint is from my personal knowledge of this investigation, and from others as reported to me.
2. On or about February 3, 2006, in the Southern District of Texas, Hinojosa was convicted of Money Laundering Promotion and Aiding and Abetting, a violation of 18 U.S.C. §§ 1956(a)(1)(A)(i) and 2. As a result of the conviction, Hinojosa was sentenced to a term of 169 months, which was to be served in a Bureau of Prisons Federal Correctional Institution (FCI).

3. Hinojosa was thereafter incarcerated in a Federal Correctional Institution, and between at least the beginning of February 2014 and September 2014, Hinojosa has been incarcerated at FCI Fort Worth.
4. In or around early March 2014, Hinojosa caused to be mailed to the United States District Judge ("the Judge") who presided over his conviction, documents warning of his intent to file a lien against the property of the Judge if the Judge did not comply with certain demands.
5. On or about March 25, 2014, Hinojosa caused to be filed with the Business and Commercial Services Division of the Arkansas Secretary of State, a UCC Financing Statement, whereby Carlos Jorge Hinojosa was listed as the secured party, and the Judge was listed as one of the debtors. The address listed on the UCC Financing Statement for the Judge was 1701 Highway 83 West, McAllen, Texas 78502. This is the address of the United States Courthouse in McAllen, Texas.
6. Though the Judge's name was misspelled on the portion of the UCC Financing Statement listing the debtor's name, in the collateral section of the UCC Financing Statement the Judge's name was spelled correctly. The UCC Financing Statement listed as collateral, all assets, personal property, appurtenances, and fixtures owned by the Judge.
7. On or about April 23, 2014, Hinojosa was interviewed by your affiant. After being properly advised of his Miranda rights, Hinojosa advised that he did in fact cause to be filed, the UCC Financing Statement referenced in this affidavit.
8. Hinojosa advised that he filed the UCC Financing Statement in order to cause the Judge and others to perform certain actions which would result in his release from prison.
9. On June 16, 2014, the Judge was interviewed by the FBI. During the interview the Judge confirmed that Hinojosa has performed no services for the Judge, exchanged no titles, or otherwise performed any duties or engaged in any transactions which might result in the Judge being indebted to Hinojosa. As such, the Judge advised that any lien or encumbrance filed against the Judge which might list Hinojosa as the secured party is false.
10. Your affiant has confirmed that a UCC Financing Statement filed with the Business and Commercial Services Division of the Arkansas Secretary of State is a public record.

11. Based upon the aforementioned facts, I believe that on or before about March 25, 2014, in the Northern District of Texas and elsewhere, **Carlos Jorge Hinojosa** committed the offense of Retaliating Against a Federal Judge by False Claim, a violation of 18 U.S.C. § 1521.

9/16/14

Date



Special Agent Marcus Watson  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence, 16<sup>th</sup> day of September, 2014, at 1:49 a.m./o.m. in Fort Worth, Texas.



JEFFREY L. CURETON  
UNITED STATES MAGISTRATE JUDGE